



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

November 29, 2010

Joshua Bundick
WFF NEPA Manager
National Aeronautics and Space Administration
Goddard Space Flight Center
Wallops Flight Facility
Wallops Island, VA 23337

Re: Final Programmatic Environmental Impact Statement (FPEIS), Wallops Flight Facility
Shoreline Restoration and Infrastructure Protection Project, Wallops Island, Virginia,
November 2010, CEQ#20100427

Dear Mr. Bundick:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1509), the U.S. Environmental Protection Agency (EPA) has reviewed the Final Programmatic Environmental Impact Statement (FPEIS) for the Wallops Flight Facility Shoreline Restoration and Infrastructure Protection Project (SRIPP). The FPEIS included responses to comments made by EPA on the Draft Programmatic Environmental Impact Statement (DPEIS). EPA rated the environmental impacts of the preferred alternative an "EC" (Environmental Concerns) and the adequacy of the impact statement as "2" (Insufficient Information) in our letter on April 19, 2010.

According to the FPEIS, the preferred alternative meets the purpose and need by reducing potential damage to assets located on Wallops Island from wave impacts associated with storm events. The preferred alternative involves augmenting 3.7 miles of shoreline with 3.199 million yd³ of dredged sand from offshore shoals and extending the existing seawall by up to 1,400 meters. The placement of hard structures such as groins or breakwaters, as well as the borrowing of sand from the north Wallops Island shoreline has not been included in the preferred alternative. Although these features were not included in the initial cycle of replenishment, future cycles may possibly consider the use of hard structure, or the use of north Wallops Island as a potential sand borrow area.

EPA remains concerned about the potential adverse effects that future replenishment cycles, especially the use the northern shoreline for sand borrowing, may have on the sensitive barrier island habitat and wildlife populations. EPA strongly encourages NASA to coordinate and follow the recommendations of NMFS, USFWS and appropriate state agencies regarding threatened and endangered species. Planned habitat, species population, and shoreline success



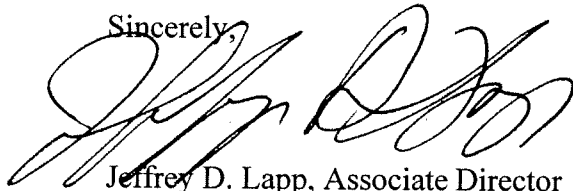
and erosional monitoring will provide very important information for future NEPA decision-making. It will help inform what the needs of the next phases of the SRIPP will be, as well as give an understanding of actual impacts to the ecosystem. Considering the potential future impacts to the Wallops Island shoreline and neighboring barrier islands, future NEPA documentation of additional SRIPP phases may warrant the preparation of Environmental Impact Statements.

EPA appreciates the additional cumulative affects analysis provided in the FPEIS. Based on this information, EPA continues to encourage NASA to only locate essential operations on Wallops Island, consider relocating critical at-risk infrastructure further inland, and avoid future investment into infrastructure on Wallops Island as much as possible. When considering additional expansion on Wallops Island, EPA encourages NASA to continue to receive input from interagency teams and public stakeholders in the NEPA process.

The Environmental Justice (EJ) portions of the document were improved from the DPEIS; however, additional changes to community identification methodology and outreach efforts could be done in future NEPA studies to strengthen the analysis. The process used in the FPEIS for identifying EJ communities used the definition of an EJ community as having a minority population of 50% or greater. It would be more beneficial to compare state and county figures for both low-income and minority populations. EJ refers to minority and/or low-income populations, therefore benchmarks must address minority and low-income populations equally. In the future, community outreach to grass roots organizations, churches, civic and other organization should be considered.

Thank you for allowing EPA with the opportunity to review and comment on the FPEIS. If you need assistance in the future, the contact for this project is Ms. Barbara Rudnick, NEPA Team Leader, at (215) 814-3322, or Ms. Alaina DeGeorgio, at 215-814-2741.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey D. Lapp', written over a horizontal line.

Jeffrey D. Lapp, Associate Director
Office of Environmental Programs

